

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1, 3-6, 8-18, 20-23 and 26 are currently pending.
- No claims are canceled herein.
- No claims are withdrawn herein.
- Claims 6, 8-16 and 21 are amended herein.
- No new claims are added herein.

Support for the amendments to the claims is found in the specification, as originally filed, and the claims. For example, support for amendments to claims 6 and 16 can be found in claim 21. The amendments submitted herein do not introduce any new matter.

### **Allowed Claims**

The Office Action indicates that claims 1, 3-5 and 26 are allowable. Applicant would like to thank the Examiner for allowing claims 1, 3-5 and 26. These claims have not been amended herein, and therefore remain in condition for allowance.

### **Claims 6, 8-15 and 21-23 Recite Statutory Subject Matter Under § 101**

Claims 6, 8-15 and 21-23 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Applicant respectfully traverses this rejection.

Applicant respectfully submits that claim 21, with the amendment herein, recites statutory subject matter under § 101 at least because the claimed computer-readable medium “stores” the computer-executable instructions. Therefore, the claimed computer-readable medium cannot embody a transitory signal, since a transitory signal is not capable of having instructions stored thereon. Consequently, claim 21 (and its dependents) is limited to tangible embodiments.

Claim 6 is amended herein in a manner similar to how claim 21 is structured. As such, the claimed computer-executable services and computer-readable information are stored on the computer-readable medium. Therefore, the claimed computer-readable medium cannot embody a transitory signal, since a transitory signal is not capable of having services and information stored thereon. Consequently, claim 6 (and its dependents) is limited to tangible embodiments.

Accordingly, Applicant respectfully asks that the Office withdraw this rejection.

### **Cited Documents**

The following documents have been applied to reject one or more claims of the Application:

- **Zintel:** Zintel et al., U.S. Patent Application Publication No. 2002/0029256
- **Saint:** Saint-Hilaire et al., U.S. Patent Application Publication No. 2003/0101294
- **Fedotov:** Fedotov et al., U.S. Patent Application Publication No. 2004/0181796

**Claims 6, 8-18 and 20 Are Non-Obvious Over Zintel in view of Saint and further in view of Fedotov**

Claims 6, 8-18 and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Zintel in view of Saint and further in view of Fedotov. Applicant respectfully requests reconsideration in light of the amendments presented herein.

**Independent Claim 6**

Claim 6, as amended herein, recites, in part:

the customizable tag-based document also describing a state of the service representing a device for an input/output event and a state of the input/output event that has been generated by the service representing the device.

The above language was not part of this claim and therefore was not considered by the Office when rejecting this claim. However, very similar language was considered by the Office when claim 21 was examined and the Office failed to cite any of the cited references as including this feature of claim 21. Accordingly, Applicant submits that the Office will not find this same feature in this claim as represented by the amended claim language herein.

For at least the reasons presented herein, the combination of cited references does not teach or suggest all of the features of this claim. Accordingly, Applicant respectfully requests that the Office withdraw the 103 rejection of this claim.

**Dependent Claims 8-15**

Claims 8-15 ultimately depend from independent claim 6. As discussed above, claim 6 is allowable over the cited documents. Therefore, claims 8-15 are also

allowable over the cited documents of record for at least their dependency from an allowable base claim, and also for the additional features that each recites.

Accordingly, Applicant respectfully requests that the Office withdraw the 103 rejection of claims 8-15.

Independent Claim 16

Claim 16, as amended herein, recites, in part:

receiving a customizable tag-based message that contains a state of the service representing the device and the input/output event that has been generated by the service representing the device.

Much of the above language was not part of this claim and therefore was not considered by the Office when rejecting this claim. However, very similar language was considered by the Office when claim 21 was examined and the Office failed to cite any of the cited references as including this feature of claim 21. Accordingly, Applicant submits that the Office will not find this same feature in this claim, as represented by the amended claim language herein.

For at least the reasons presented herein, the combination of cited references does not teach or suggest all of the features of this claim. Accordingly, Applicant respectfully requests that the Office withdraw the 103 rejection of this claim.

Dependent Claims 17, 18 and 20

Claims 17, 18 and 20 ultimately depend from independent claim 16. As discussed above, claim 16 is allowable over the cited documents. Therefore, claims 17, 18 and 20 are also allowable over the cited documents of record for at least their

dependency from an allowable base claim, and also for the additional features that each recites.

Accordingly, Applicant respectfully requests that the Office withdraw the 103 rejection of claims 17, 18 and 20.

### **Conclusion**

For at least the foregoing reasons, all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application.

If any issues remain that would prevent allowance of this application, Applicant requests that the Examiner contact the undersigned representative before issuing a subsequent Action.

Respectfully Submitted,

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Representative for Applicant

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Dated: 07/26/2010